

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

v.

CONCORD MANAGEMENT AND
CONSULTING LLC

Defendant.

CRIMINAL NUMBER:

1:18-cr-00032-2-DLF

**DEFENDANT CONCORD MANAGEMENT AND CONSULTING LLC'S RESPONSE
REGARDING MOTION TO DISCLOSE ALL *EX PARTE* COMMUNICATIONS
BETWEEN THE COURT AND THE GOVERNMENT REGARDING THE
GOVERNMENT'S INTENTION TO SEEK A SUPERSEDING INDICTMENT**

Defendant Concord Management and Consulting LLC ("Concord"), through counsel, submits this response regarding its Motion to Disclose, ECF No. 225, pursuant to the Court's November 7, 2019 Minute Order. Concord does not have any position with respect to redactions to the materials disclosed in connection with the Motion, including the transcript of the November 7, 2019 sealed telephone conference.

Dated: November 8, 2019

Respectfully submitted,

CONCORD MANAGEMENT AND
CONSULTING LLC

By Counsel

/s/Eric A. Dubelier

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